

USDC SDNY DOCUMENT ELECTRONICALLY FILED DOC #: DATE FILED: 12/4/2020
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November 23, 2020

VIA ECF

The Honorable John P. Cronan
United States District Judge
United States District Court
Southern District of New York
500 Pearl Street, Room 1320
New York, NY 10007

Re: *The Gabelli Asset Fund, et al. v. Su Ping Lu, et al.*, Case No. 1:20-cv-08296; *Husson v. Garrett Motion Inc., et al*, Case No. 1:20-cv-07992; *Froehlich v. Olivier Rabiller, et al.*, Case No. 1:20-cv-09279.

Dear Judge Cronan:

Plaintiffs in the above-captioned related matters hereby jointly move this Court for an order adjourning the Initial Pretrial Conferences currently set for December 7, 2020 until the Court appoints a lead plaintiff and lead counsel pursuant to the Private Securities Litigation Reform Act (15 U.S.C. § 78u-4(3)), setting related briefing deadlines, and consolidating the above-captioned actions. A stipulation and proposed order is being filed contemporaneously herewith.

Plaintiffs have not previously requested an adjournment of the Initial Pretrial Conferences. Counsel for Defendant Su Pin Lu has consented to this request and signed the stipulation. Defendants Oliver Rabiller, Alessandro Gili, Peer Bracke, Sean Deason, Craig Balis, Thierry Mabru, Russell James, Carlos Cardoso, Maura Clark, Courtney Enghauser, Susan Main, Carsten Reinhardt and Scott Tozier (collectively, the “Garrett D&O Defendants”) have not yet appeared in this litigation. The undersigned counsel have notified Garrett’s bankruptcy counsel of this stipulation, and said counsel has confirmed the Garrett D&O Defendants have not yet retained counsel and that Garrett’s bankruptcy counsel does not object to the filing of this joint stipulation.

Hon. John P. Cronan
November 23, 2020
Page 2 of 2

Respectfully Submitted,

/s/ Andrew J. Entwistle

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Plaintiffs' request is GRANTED. The Initial Pretrial Conference scheduled for December 7, 2020 at 2:00 p.m. is adjourned *sine die*.

SO ORDERED.

Date: December 3, 2020
New York, New York



JOHN P. CRONAN
United States District Judge